

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

MARY GRACE WEBER
210 Sunnybrook Drive
Fortuna, CA 95540

Registered Nurse License No. 284314

Respondent

Case No. 2012-250

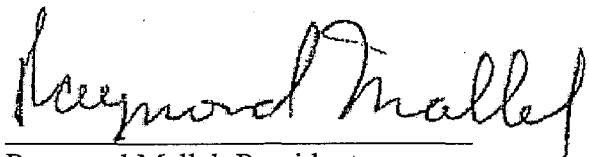
OAH No. 2011120904

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **March 4, 2013.**

IT IS SO ORDERED **February 2, 2013.**



Raymond Mallel, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

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Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2012-250

13 **MARY GRACE WEBER**
210 Sunnybrook Drive
14 Fortuna, CA 95540
Registered Nurse License No. 284314

OAH No. 2011120904

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

15 Respondent.

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
18 entitled proceedings that the following matters are true:

19 PARTIES

20 1. Louise R. Bailey, M.Ed., RN ("Complainant") is the Executive Officer of the Board
21 of Registered Nursing. She brought this action solely in her official capacity and is represented in
22 this matter by Kamala D. Harris, Attorney General of the State of California, by Judith J. Loach,
23 Deputy Attorney General.

24 2. Respondent Mary Grace Weber ("Respondent") is represented in this proceeding by
25 attorney Scott Kiepen, Esq., whose address is: Hooper, Lundy & Bookman PC, 575 Market
26 Street, Suite 2300, San Francisco, CA 94105.

27 3. On or about August 31, 1977, the Board of Registered Nursing issued Registered
28 Nurse License No. 284314 to Respondent. The Registered Nurse License was in full force and

1 effect at all times relevant to the charges brought in Accusation No. 2012-250 and will expire on
2 February 28, 2013, unless renewed.

3 JURISDICTION

4 4. Accusation No. 2012-250 was filed before the Board of Registered Nursing
5 ("Board"), Department of Consumer Affairs, and is currently pending against Respondent. The
6 Accusation and all other statutorily required documents were properly served on Respondent on
7 October 24, 2011. Respondent timely filed her Notice of Defense contesting the Accusation.

8 5. A copy of Accusation No. 2012-250 is attached as Exhibit A and incorporated herein
9 by reference.

10 ADVISEMENT AND WAIVERS

11 6. Respondent has carefully read, fully discussed with counsel, and understands the
12 charges and allegations in Accusation No. 2012-250. Respondent has also carefully read, fully
13 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary
14 Order.

15 7. Respondent is fully aware of her legal rights in this matter, including the right to a
16 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at
17 her own expense; the right to confront and cross-examine the witnesses against her; the right to
18 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
19 compel the attendance of witnesses and the production of documents; the right to reconsideration
20 and court review of an adverse decision; and all other rights accorded by the California
21 Administrative Procedure Act and other applicable laws.

22 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
23 every right set forth above.

24 CULPABILITY

25 9. Respondent understands and agrees that the charges in the Accusation No. 2012-250,
26 if proven at hearing, constitute cause for imposing discipline on her Registered Nurse License.

27 10. For the purpose of resolving this matter without the expense and uncertainty of
28 further proceedings, Respondent agrees that at a hearing, Complaint could establish a factual

1 basis for the charges in the Accusation, and that Respondent hereby gives up her right to contest
2 those charges.

3 11. Respondent agrees that her Registered Nurse License is subject to discipline and she
4 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order
5 below.

6 CONTINGENCY

7 12. This stipulation shall be subject to approval by the Board of Registered Nursing.
8 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
9 Registered Nursing may communicate directly with the Board regarding this stipulation and
10 settlement, without notice to or participation by Respondent or her counsel. By signing the
11 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
12 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
13 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
14 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
15 action between the parties, and the Board shall not be disqualified from further action by having
16 considered this matter.

17 13. The parties understand and agree that facsimile copies of this Stipulated Settlement
18 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
19 effect as the originals.

20 14. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
21 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
22 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
23 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
24 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
25 writing executed by an authorized representative of each of the parties.

26 15. In consideration of the foregoing admissions and stipulations, the parties agree that
27 the Board may, without further notice or formal proceeding, issue and enter the following
28 Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 284314 issued to Respondent Mary Grace Weber is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following terms and conditions.

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. **Comply with the Board's Probation Program.** Respondent shall fully comply with the conditions of the Probation Program established by the Board and cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times maintain an active, current license status with the Board, including during any period of suspension.

Upon successful completion of probation, Respondent's license shall be fully restored.

3. **Report in Person.** Respondent, during the period of probation, shall appear in person at interviews/meetings as directed by the Board or its designated representatives.

4. **Residency, Practice, or Licensure Outside of State.** Periods of residency or

1 practice as a registered nurse outside of California shall not apply toward a reduction of this
2 probation time period. Respondent's probation is tolled, if and when she resides outside of
3 California. Respondent must provide written notice to the Board within 15 days of any change of
4 residency or practice outside the state, and within 30 days prior to re-establishing residency or
5 returning to practice in this state.

6 Respondent shall provide a list of all states and territories where she has ever been licensed
7 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide
8 information regarding the status of each license and any changes in such license status during the
9 term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing
10 license during the term of probation.

11 **5. Submit Written Reports.** Respondent, during the period of probation, shall submit
12 or cause to be submitted such written reports/declarations and verification of actions under
13 penalty of perjury, as required by the Board. These reports/declarations shall contain statements
14 relative to Respondent's compliance with all the conditions of the Board's Probation Program.
15 Respondent shall immediately execute all release of information forms as may be required by the
16 Board or its representatives.

17 Respondent shall provide a copy of this Decision to the nursing regulatory agency in every
18 state and territory in which she has a registered nurse license.

19 **6. Function as a Registered Nurse.** Respondent, during the period of probation, shall
20 engage in the practice of registered nursing in California for a minimum of 24 hours per week for
21 6 consecutive months or as determined by the Board.

22 For purposes of compliance with the section, "engage in the practice of registered nursing"
23 may include, when approved by the Board, volunteer work as a registered nurse, or work in any
24 non-direct patient care position that requires licensure as a registered nurse.

25 The Board may require that advanced practice nurses engage in advanced practice nursing
26 for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

27 If Respondent has not complied with this condition during the probationary term, and
28 Respondent has presented sufficient documentation of her good faith efforts to comply with this

condition, and if no other conditions have been violated, the Board, in its discretion, may grant an extension of Respondent's probation period up to one year without further hearing in order to comply with this condition. During the one year extension, all original conditions of probation shall apply.

7. **Employment Approval and Reporting Requirements.** Respondent shall obtain prior approval from the Board before commencing or continuing any employment, paid or voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all performance evaluations and other employment related reports as a registered nurse upon request of the Board.

Respondent shall provide a copy of this Decision to her employer and immediate supervisors prior to commencement of any nursing or other health care related employment.

In addition to the above, Respondent shall notify the Board in writing within seventy-two (72) hours after she obtains any nursing or other health care related employment. Respondent shall notify the Board in writing within seventy-two (72) hours after she is terminated or separated, regardless of cause, from any nursing, or other health care related employment with a full explanation of the circumstances surrounding the termination or separation.

8. **Supervision.** Respondent shall obtain prior approval from the Board regarding Respondent's level of supervision and/or collaboration before commencing or continuing any employment as a registered nurse, or education and training that includes patient care.

Respondent shall practice only under the direct supervision of a registered nurse in good standing (no current discipline) with the Board of Registered Nursing, unless alternative methods of supervision and/or collaboration (e.g., with an advanced practice nurse or physician) are approved.

Respondent's level of supervision and/or collaboration may include, but is not limited to the following:

(a) Maximum - The individual providing supervision and/or collaboration is present in the patient care area or in any other work setting at all times.

(b) Moderate - The individual providing supervision and/or collaboration is in the patient

1 care unit or in any other work setting at least half the hours Respondent works.

2 (c) Minimum - The individual providing supervision and/or collaboration has person-to-
3 person communication with Respondent at least twice during each shift worked.

4 (d) Home Health Care - If Respondent is approved to work in the home health care
5 setting, the individual providing supervision and/or collaboration shall have person-to-person
6 communication with Respondent as required by the Board each work day. Respondent shall
7 maintain telephone or other telecommunication contact with the individual providing supervision
8 and/or collaboration as required by the Board during each work day. The individual providing
9 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to
10 patients' homes visited by Respondent with or without Respondent present.

11 9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in any
12 private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse,
13 or for an in-house nursing pool.

14 Respondent shall not work for a licensed home health agency as a visiting nurse unless the
15 registered nursing supervision and other protections for home visits have been approved by the
16 Board. Respondent shall not work in any other registered nursing occupation where home visits
17 are required.

18 Respondent shall not work in any health care setting as a supervisor of registered nurses.
19 The Board may additionally restrict Respondent from supervising licensed vocational nurses
20 and/or unlicensed assistive personnel on a case-by-case basis.

21 Respondent shall not work as a faculty member in an approved school of nursing or as an
22 instructor in a Board approved continuing education program.

23 Respondent shall work only on a regularly assigned, identified and predetermined
24 worksite(s) and shall not work in a float capacity.

25 If Respondent is working or intends to work in excess of 40 hours per week, the Board may
26 request documentation to determine whether there should be restrictions on the hours of work.

27 10. **Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll and
28 successfully complete a course(s) relevant to the practice of registered nursing no later than six

1 months prior to the end of her probationary term.

2 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
3 Respondent shall submit to the Board the original transcripts or certificates of completion for the
4 above required course(s). The Board shall return the original documents to Respondent after
5 photocopying them for its records.

6 11. **Cost Recovery.** Respondent shall pay to the Board costs associated with its
7 investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
8 amount of \$ 4,724.00. Respondent shall be permitted to pay these costs in a payment plan
9 approved by the Board, with payments to be completed no later than three months prior to the end
10 of the probation term.

11 If Respondent has not complied with this condition during the probationary term, and
12 Respondent has presented sufficient documentation of her good faith efforts to comply with this
13 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
14 extension of Respondent's probation period up to one year without further hearing in order to
15 comply with this condition. During the one year extension, all original conditions of probation
16 will apply.

17 12. **Violation of Probation.** If Respondent violates the conditions of her probation, the
18 Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order
19 and impose the stayed discipline (revocation/suspension) of Respondent's license.

20 If during the period of probation, an accusation or petition to revoke probation has been
21 filed against Respondent's license or the Attorney General's Office has been requested to prepare
22 an accusation or petition to revoke probation against Respondent's license, the probationary
23 period shall automatically be extended and shall not expire until the accusation or petition has
24 been acted upon by the Board.

25 13. **License Surrender.** During Respondent's term of probation, if she ceases practicing
26 due to retirement, health reasons or is otherwise unable to satisfy the conditions of probation,
27 Respondent may surrender her license to the Board. The Board reserves the right to evaluate
28 Respondent's request and to exercise its discretion whether to grant the request, or to take any

1 other action deemed appropriate and reasonable under the circumstances, without further hearing.
2 Upon formal acceptance of the tendered license and wall certificate, Respondent will no longer be
3 subject to the conditions of probation.

4 Surrender of Respondent's license shall be considered a disciplinary action and shall
5 become a part of Respondent's license history with the Board. A registered nurse whose license
6 has been surrendered may petition the Board for reinstatement no sooner than the following
7 minimum periods from the effective date of the disciplinary decision:

8 (1) Two years for reinstatement of a license that was surrendered for any reason other
9 than a mental or physical illness; or

10 (2) One year for a license surrendered for a mental or physical illness.

11 ACCEPTANCE

12 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
13 discussed it with my attorney, Scott Kiepen. I understand the stipulation and the effect it will
14 have on my Registered Nurse License. I enter into this Stipulated Settlement and Disciplinary
15 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order
16 of the Board of Registered Nursing.

17
18 DATED: 8/24/12 Mary Grace Weber
19 MARY GRACE WEBER
Respondent

20 I have read and fully discussed with Respondent Mary Grace Weber the terms and
21 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
22 I approve its form and content.

23 DATED: 8/27/12 Scott Kiepen
24 Scott Kiepen
Attorney for Respondent

25
26 ///

27 ///

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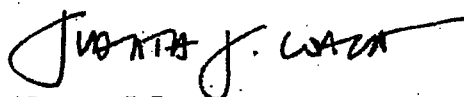
ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: August 27, 2012

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
FRANK H. PACOE
Supervising Deputy Attorney General



JUDITH J. LOACH
Deputy Attorney General
Attorneys for Complainant

SF2011200140

Exhibit A

Accusation No. 2012-250

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
3 JUDITH J. LOACH
Deputy Attorney General
4 State Bar No. 162030
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E-mail: Judith.Loach@doj.ca.gov
7 *Attorneys for Complainant*

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No.

2012-250

13 **MARY GRACE WEBER**
14 **210 Sunnybrook Drive**
Fortuna, CA 95540
Registered Nurse License No. 284314

ACCUSATION

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21 Consumer Affairs.

22 2. On or about August 31, 1977, the Board of Registered Nursing issued Registered
23 Nurse License Number 284314 to Mary Grace Weber ("Respondent"). The Registered Nurse
24 License was in full force and effect at all times relevant to the charges brought herein and will
25 expire on February 28, 2013, unless renewed.

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1 8. California Code of Regulations, title 16, section 1443, states:

2 "As used in Section 2761 of the code, 'incompetence' means the lack of possession of or the
3 failure to exercise that degree of learning, skill, care and experience ordinarily possessed and
4 exercised by a competent registered nurse as described in Section 1443.5."

5 9. California Code of Regulations, title 16, section 1443.5 states:

6 "A registered nurse shall be considered to be competent when he/she consistently
7 demonstrates the ability to transfer scientific knowledge from social, biological and physical
8 sciences in applying the nursing process, as follows:

9 "(1) Formulates a nursing diagnosis through observation of the client's physical condition
10 and behavior, and through interpretation of information obtained from the client and others,
11 including the health team.

12 "(2) Formulates a care plan, in collaboration with the client, which ensures that direct and
13 indirect nursing care services provide for the client's safety, comfort, hygiene, and protection, and
14 for disease prevention and restorative measures.

15 "(3) Performs skills essential to the kind of nursing action to be taken, explains the health
16 treatment to the client and family and teaches the client and family how to care for the client's
17 health needs.

18 "(4) Delegates tasks to subordinates based on the legal scopes of practice of the
19 subordinates and on the preparation and capability needed in the tasks to be delegated, and
20 effectively supervises nursing care being given by subordinates.

21 "(5) Evaluates the effectiveness of the care plan through observation of the client's physical
22 condition and behavior, signs and symptoms of illness, and reactions to treatment and through
23 communication with the client and health team members, and modifies the plan as needed.

24 "(6) Acts as the client's advocate, as circumstances require, by initiating action to improve
25 health care or to change decisions or activities which are against the interests or wishes of the
26 client, and by giving the client the opportunity to make informed decisions about health care
27 before it is provided."
28

1 COST RECOVERY

2 10. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
3 administrative law judge to direct a licensee found to have committed a violation or violations of
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
5 enforcement of the case.

6 FACTUAL BACKGROUND

7 11. At all relevant times, Respondent was the Director of Nursing ("DON") at Granada
8 Healthcare and Rehab Center ("GHRC"), a skilled nursing facility in Eureka, California. As the
9 DON, Respondent "assumed the ultimate responsibility for coordinating plans for the total care of
10 each resident which comply with physician's orders, governmental regulations and facility
11 resident care policies." Respondent was part of an Interdisciplinary Team ("IDT") at GHRC that
12 was to conduct weekly rounds to ensure that nursing care plans and progress notes accurately
13 reflected the management of resident's with pressure ulcers.¹

14 12. On or about November 5, 2008, P.R. was admitted to GHRC. She was 91 years old,
15 with a history of diabetes and a right hip fracture which was being treated by a leg immobilizer
16 brace.

17 13. On admission, GRHC staff failed to institute a pressure ulcer or skin integrity care
18 plan for prevention of pressure ulcers and/or interventions regarding P.R.'s immobilizer brace.

19 14. On November 18, 2008, P.R. was noted to have a Stage II pressure ulcer on her right
20 heel. There were no further assessments until December 1, 2008 at which time P.R.'s pressure
21 ulcer was classified as being at a Stage IV.

22 15. A non-urgent referral was made by GRHC staff on December 8, 2008, for P.R. to be
23 evaluated at the Mad River Community Hospital Wound Clinic, with an appointment scheduled
24 approximately one month later on January 5, 2009.

25
26 ¹ A pressure ulcer is defined as any lesion caused by unrelieved pressure which results in
27 damage to underlying tissue(s). They are graded from Stage I to Stage IV to classify the degree
28 of tissue damage. A Stage IV pressure ulcer is the most serious and is evidenced by full thickness
skin loss with exposed bone, tendon and/or muscle.

1 16. P.R.'s right heel pressure ulcer progressively worsened. At the time she presented to
2 the Wound Clinic on January 5, 2009, her right leg had extensive necrotic (dead) tissue with her
3 Achilles tendon fully exposed and foul smelling drainage.

4 17. The Wound Clinic immediately referred P.R. to Saint Joseph's Hospital where she
5 underwent amputation of her right lower leg due to gangrene.

6 FIRST CAUSE FOR DISCIPLINE

7 (Gross Negligence/Incompetence – Failure to Ensure Implementation of Pressure
8 Ulcer/Skin Integrity Care Plan)

9 18. Respondent is subject to discipline under Code section 2761(a)(1) for gross
10 negligence and/or incompetence in that as the DON, she failed to ensure that GHRC staff
11 implemented a pressure ulcer/skin integrity care plan to monitor P.R., as set forth above in
12 paragraphs 11 through 17.

13 SECOND CAUSE FOR DISCIPLINE

14 (Gross Negligence/Incompetence – Failure to Ensure Appropriate
15 Monitoring of Right Heel Pressure Ulcer)

16 19. Respondent is subject to discipline under Code section 2761(a)(1) for gross
17 negligence and/or incompetence in that as the DON, she failed to ensure that nursing staff were
18 appropriately monitoring P.R.'s right heel pressure ulcer, as set forth above in paragraphs 11
19 through 17.

20 THIRD CAUSE FOR DISCIPLINE

21 (Gross Negligence/Incompetence – Failure to Conduct Weekly Rounds on Resident's With
22 Pressure Ulcers)

23 20. Respondent is subject to discipline under Code section 2761(a)(1) for gross
24 negligence and/or incompetence in that as the DON, she failed to conduct random rounds with the
25 treatment nurses and/or wound team members to ensure compliance with GRHC's pressure ulcer
26 management policy, as set forth above in paragraphs 11 through 17.

27 ///

28 ///

1 FOURTH CAUSE FOR DISCIPLINE

2 (Gross Negligence/Incompetence – Failure to Ensure Timely Referral)

3 21. Respondent is subject to discipline under Code section 2761(a)(1) for gross
4 negligence and/or incompetence in that as the DON, she failed to ensure that P.R. was timely seen
5 at the Wound Care Clinic, as set forth above in paragraphs 11 through 17.

6 FIFTH CAUSE FOR DISCIPLINE

7 (Gross Negligence/Incompetence – Failure To Timely Notify Physician)

8 22. Respondent is subject to discipline under Code section 2761(a)(1) for gross
9 negligence and/or incompetence in that as the DON, she failed to ensure that P.R.'s physician was
10 updated on the severity of her pressure ulcer, as set forth above in paragraphs 11 through 17.

11 PRAYER

12 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
13 and that following the hearing, the Board of Registered Nursing issue a decision:

14 1. Revoking or suspending Registered Nurse License Number 284314, issued to Mary
15 Grace Weber.

16 2. Ordering Mary Grace Weber to pay the Board of Registered Nursing the reasonable
17 costs of the investigation and enforcement of this case, pursuant to Business and Professions
18 Code section 125.3.

19 3. Taking such other and further action as deemed necessary and proper.

20 DATED: October 24, 2011

21 *Louise R. Bailey*
22 LOUISE R. BAILEY, M.ED., RN
23 Executive Officer
24 Board of Registered Nursing
25 Department of Consumer Affairs
26 State of California
27 Complainant
28

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